## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

START MAN FURNITURE, LLC, et al.,1

Debtors.

ALFRED T. GIULIANO, in his capacity as Chapter 7 Trustee of Start Man Furniture, LLC, *et al.*,

Plaintiff,

VS.

SEE ATTACHED EXHIBIT B,

Defendants.

Chapter 7

Case No. 20-10553 (CTG)

(Jointly Administered)

Adv. Proc. Nos. SEE ATTACHED EXHIBIT B

## CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER APPROVING STIPULATION FOR FURTHER EXTENSION OF TIME FOR DEFENDANTS TO ANSWER THE COMPLAINT

The undersigned hereby certifies as follows:

1. On April 7, 2020, Alfred T. Giuliano, was appointed as the chapter 7 trustee (the "Trustee") of the Debtors' bankruptcy estates. On or about March 1, 2022, the Trustee filed the Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550 (the "Complaints") with the U.S. Bankruptcy Court for the District of Delaware (the "Court") against the defendants listed on **Exhibit B** (collectively, the "Defendant" together with Plaintiff, the "Parties").

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, include: Start Man Furniture, LLC (f/k/a Art Van Furniture, LLC) (9205); SVF Holding Company, Inc. (f/k/a AVF Holding Company, Inc.) (0291); SVCE, LLC (f/k/a AVCE, LLC) (2509); StartVF Holdings I, LLC (f/k/a AVF Holdings I, LLC) (2537); StartVF Holdings II, LLC (f/k/a AVF Holdings II, LLC) (7472); SVF Parent, LLC (f/k/a AVF Parent, LLC) (3451); Levin Parent, LLC (8052); Start Man Furniture of Canada, LLC (f/k/a Art Van Furniture of Canada, LLC) (9491); SV Sleep Franchising, LLC (f/k/a AV Pure Sleep Franchising, LLC) (8968); SVF Franchising, LLC (f/k/a AVF Franchising, LLC) (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

- 2. On or about April 8, 2022, the Trustee and Defendants filed a *Stipulation For Extension of Time for Defendants to Answer the Complaint*.
- 3. The Parties have agreed and entered into a stipulation, subject to this Court's approval, to further extend the Defendant's time to answer the Plaintiff's Complaints. Attached hereto as **Exhibit A** is a proposed form of order approving the stipulation. The stipulation is attached as **Exhibit 1** to the proposed form of order.
- 4. Accordingly, the Parties request that this Court enter the proposed form of order.

  Dated: April 28, 2022

## PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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Counsel to Plaintiff Alfred T. Giuliano, Chapter 7 Trustee for the Estates of Start Man Furniture, LLC, et al.